IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re:

LEONARD EDWARD FIELDS
CAROLYN ANN FIELDS,

DEBTORS.

CHAPTER 13

CASE NO. 16-31326-KLP

RUSHMORE LOAN MANAGEMENT SERVICES, LLC AS SERVICING AGENT FOR WILMINGTON SAVINGS FUND SOCIETY, FSB, D/B/A CHRISTIANA TRUST, AS TRUSTEE FOR NORMANDY MORTGAGE LOAN TRUST, SERIES 2016-1,

RESPONDENT.

RESPONSE TO DEBTOR'S OBJECTION TO ALLOWANCE OF CLAIM

Rushmore Loan Management Services LLC as servicing agent for Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, as trustee for Normandy Mortgage Loan Trust, 2016-1, by counsel, submits the following in response to the Debtor's Objection to Allowance of Claim (the "Objection"):

1. Rushmore Loan Management Services LLC as servicing agent for Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, as trustee for Normandy Mortgage Loan Trust, 2016-1 ("Secured Creditor") is a secured creditor of Debtors as evidenced in the Proof of Claim (the "Claim") filed July 20, 2016 (Court's Claim No. 8).
2. The Debtors have objected to the Claim stating that there are arrearages claimed in an "inaccurate and inconsistent" manner. Debtors also state that "many" fees, costs, and other charges have actually been caused by the Secured Creditor.
3. Secured Creditor states that the Claim speaks for itself as filed.
4. Secured Creditor asserts that the Objection lacks the requisite specificity to evaluate Debtors' concerns and potentially rectify any discrepancy.
5. Secured Creditor hereby denies the assertions, claims, and legal conclusions that are expressed and could be inferred from the Objection. Secured Creditor demands strict proof

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supporting the disputed payments or charges.

6. Secured Creditor requests a hearing on the merits of the Objection.

WHEREFORE, the undersigned respectfully requests a hearing on this matter and that the Court deny the Debtors' Objection and grant further relief as deemed proper.

Rushmore Loan Management Services LLC as servicing agent for Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, as trustee for Normandy Mortgage Loan Trust, 2016-1

By:**/s/JOHNIE R. MUNCY**
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CERTIFICATE OF SERVICE

I certify that on September 27, 2016, the foregoing Response was served via CM/ECF on Suzanne E. Wade, Trustee, and Richard O. Gates, Counsel for Debtors, at the email addresses registered with the Court, and that a true copy was mailed via first class mail, postage prepaid, to Leonard Edward Fields and Carolyn Ann Fields, Debtors, 2508 Royall Avenue, Richmond, VA 23224.

/s/JOHNIE R. MUNCY
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